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8 Attorneys for Defendants, COUNTY OF SAN BERNARDINO and BREANA FITE

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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

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13 DEBORAH MOLLER, an individual
and successor –in-interest of
BRET BREUNIG, deceased,

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Plaintiffs,

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vs.

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17 COUNTY OF SAN BERNARDINO, a
public entity; BREANA FITE

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Defendant.

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MASTER CASE NO. 5:22-CV-01306-
DSF-MAR

*Assigned for All Purposes to:
Hon. Dale S. Fischer—Courtroom 7D*

**STIPULATION OF THE PARTIES
RE COUNTY OF SAN
BERNARDINO VICARIOUS
LIABILITY**

Trial Date: August 13, 2024

*Complaint filed: 07/07/22
FAC filed: 09/19/22
SAC filed: 12/08/22
TAC filed: 01/30/23*

**STIPULATION OF THE PARTIES RE COUNTY OF SAN BERNARDINO
VICARIOUS LIABILITY**

1 **TO THE COURT, THE PARTIES, AND THE ATTORNEYS OF**
2 **RECORD:**

3 Plaintiff DEBORAH MOLLER, and Defendants COUNTY OF SAN
4 BERNARDINO and BREANA FITE (collectively “the Parties”), by and through
5 their undersigned counsel, hereby submit the following stipulation regarding the
6 vicarious liability of Defendant COUNTY OF SAN BERNARDINO:

7 IT IS HEREBY STIPULATED, by and between the Parties, that at all
8 relevant times, Defendant BREANA FITE was acting in the course and scope of her
employment with Defendant COUNTY OF SAN BERNARDINO.

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10 IT IS HEREBY FURTHER STIPULATED, by and between the Parties, that
11 Defendant COUNTY OF SAN BERNARDINO is vicariously liable for any
12 damages against Defendant BREANA FITE, and only if damages are found against
Defendant BREANA FITE.

14 DATED: August 8, 2024

LYNBERG & WATKINS
A Professional Corporation

17 By: /s/ Shannon L. Gustafson
18 **SHANNON L. GUSTAFSON**
19 **AMY R. MARGOLIES**
20 **ANITA K. CLARKE**
Attorneys for Defendants,
COUNTY OF SAN BERNARDINO and
BREANA FITE

21 DATED: August 8, 2024

CONLOGUE LAW, LLP

23 By: /s/ Kevin S. Conlogue
24 **ASHLEY M. CONLOGUE**
25 **KEVIN S. CONLOGUE**
26 Attorneys for Plaintiff
DEBORAH MOLLER

**STIPULATION OF THE PARTIES RE COUNTY OF SAN BERNARDINO
VICARIOUS LIABILITY**

1 I certify that all parties to this document have consented to its filing and to the
2 language contained herein and have authorized the undersigned to affix their
3 electronic signatures.

4
5 DATED: August 8, 2024

LYNBERG & WATKINS
A Professional Corporation

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7 By: */s/Shannon L. Gustafson* _____
8 **SHANNON L. GUSTAFSON**
9 **AMY R. MARGOLIES**
10 **ANITA K. CLARKE**
11 Attorneys for Defendants,
12 COUNTY OF SAN BERNARDINO and
13 BREANA FITE
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**STIPULATION OF THE PARTIES RE COUNTY OF SAN BERNARDINO
VICARIOUS LIABILITY**